



CFAC

12 DEC 2014 RCVD

FAX COVER SHEET

TO: Office of the Governor
The Honorable Steve Bullock

FAX NUMBER: (406) 444-5529

FROM: Cheryl Driscoll

DATE: December 12, 2014

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December 12, 2014

VIA FAX 406-444-5529

The Honorable Steve Bullock
Office of the Governor
PO Box 200801
Helena MT 59620-0801

RE: Columbia Falls Aluminum Company

Dear Governor Bullock,

As you may know, the United States Environmental Protection Agency ("EPA") is considering listing the Columbia Falls Aluminum Company ("CFAC") site in Columbia Falls, Montana on the National Priorities List ("NPL") pursuant to the Comprehensive Environmental, Response and Compensation Act ("CERCLA"). The EPA has indicated that it will propose the site for listing if it receives a letter from you supporting such listing.

While we understand the interest that some at the Montana Department of Environmental Quality may have in the access to federal cleanup funds that listing the site on the NPL may provide, we believe such a listing is an unnecessary bureaucratic step that will delay the cleanup of the site and could limit economic development in the Flathead Valley.

The EPA's NPL Superfund redevelopment program notwithstanding, listing on the NPL has not resulted in expeditious cleanups. In the last 31 years, the EPA has listed 18 sites in Montana on the NPL and none have been removed. Some of the sites have been on the list for the entire 31 years. The EPA's Superfund redevelopment program has not helped. The two Montana sites that have been included in the EPA's Superfund redevelopment program, the Idaho Pole Company and the Mouat Industries site, completed clean up construction in 1998 and 1996 respectively and still have not been de-listed. Listing on the NPL can stigmatize a property and prevent others from seeking to redevelop the site and thus potentially limit economic growth in Flathead County.

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CFAC is ready, willing and able to begin the site assessment now. CFAC has hired a qualified contractor, Roux Associates, to develop a Remedial Investigation Work Plan. CFAC is committed to completing the site assessment process as efficiently as possible while fully complying with federal and state standards to perform such an assessment. CFAC has approached the EPA to discuss entering into an AOC with EPA and the State of Montana to perform the assessment. There is no need to engage in the additional step of listing the site on the NPL.

I would welcome the opportunity to meet with you and your staff to discuss this matter. Please feel free to contact me at 1.203.328.3198 to arrange a mutually agreeable meeting time and place.

Very Truly Yours,



Cheryl Driscoll, Secretary